

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF VIRGINIA  
Lynchburg Division

In re: ) Chapter 7  
)  
EMERALD M HANSEN, ) Case No. **19-60598**  
)  
)  
Debtor. )

**TRUSTEE’S MOTION FOR AN ORDER EXTENDING THE DEADLINE  
FOR THE FILING OF AN OBJECTION TO DEBTOR’S EXEMPTIONS**

Hannah W. Hutman, Trustee (the “Trustee”) moves the Court for an order extending the deadline for the filing of an objection to the Debtor’s claim of exemptions, as follows:

1. Emerald M Hansen (“the Debtor”) filed a voluntary petition under Chapter 7 of Title 11, United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Western District of Virginia, Lynchburg Division (the “Court”) on March 19, 2019 (the “Petition Date”), commencing the above-captioned case (the “Case”).

2. The Trustee was appointed as the trustee in the Case and continued to serve in that capacity until she was discharged of her duties upon the Court’s closure of the Case on July 3, 2019.

3. On March 22, 2022, the Trustee filed a Motion to Reopen Case [Docket No. 13] due to the discovery of potential assets that had not previously been disclosed. On March 14, 2022, the Court entered an Order Granting Motion to Reopen Case [Docket No. 14].

4. The Debtor filed Amended Schedules and has claimed the exemption of certain personal property under 11 U.S.C §522. The present deadline for the filing of objections to the exemptions claimed by the Debtor is May 8, 2022. The Trustee has been unable to determine if objections to the Debtor’s claims of exemption of are warranted. The Trustee needs additional

time to obtain information from the Debtor and Debtor's counsel and to determine the extent of claims in this case.

5. As a result, cause exists for the grant of an extension of the deadline to object to the Debtor's claims of exemption to and including July 22, 2022, as permitted by Federal Rule of Bankruptcy Procedure 4003(b)(1).

6. Debtor's counsel has consented to the relief requested herein.

WHEREFORE, the Trustee, by counsel, moves the Court to enter an order (1) granting the Motion in its entirety, (2) extending the deadline to object to the Debtor's claims of exemption to and including July 22, 2022 and (3) granting such other relief as is just.

HANNAH W. HUTMAN, TRUSTEE FOR  
EMERALD M HANSEN

By: /s/ Hannah W. Hutman  
Hannah W. Hutman, Chapter 7 Trustee

Hannah W. Hutman (VSB No. 79635)  
[hhutman@hooverpenrod.com](mailto:hhutman@hooverpenrod.com)  
342 S. Main Street  
Harrisonburg, VA 22801  
540-433-2444  
*Chapter 7 Trustee*

CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2022, I filed the foregoing Motion with the Court using the CM/ECF filing system, causing a copy thereof to be served upon the U.S. Trustee and counsel for the Debtor by electronic notice.

/s/ Hannah W. Hutman  
Hannah W. Hutman